

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Protective Order (Dkt. 98), Plaintiffs, through their undersigned counsel, hereby respectfully move this Court to seal the exhibits attached to their Memorandum of Law in Support of Plaintiffs’ Motion for *In Camera* Inspection and To Compel Production of Documents Wrongfully Withheld as Privileged, as well as certain portions of its Memorandum of Law that reference those exhibits. These exhibits and portions of the brief contain material Defendant Google and non-party Lazard Frères & Co. LLC have designated as confidential or highly confidential. Consistent with the local rule and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are contained in the memorandum of law concurrently filed in support of this motion. A proposed order is attached for the Court’s convenience.

Dated: May 19, 2023

Respectfully submitted,

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